

***IN THE DISTRICT COURT OF THE UNITED STATES***  
***for the Western District of New York***

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**MARCH 2024 GRAND JURY**  
**(Impaneled March 22, 2024)**

**THE UNITED STATES OF AMERICA**

**INDICTMENT**

**-vs-**

**Violations:**

**NICHOLAS BLOOM**

Title 18, United States Code,  
Section 2261A(2)(B)  
(2 Counts)

**COUNT 1**

**(Cyberstalking)**

**The Grand Jury Charges That:**

Between on or about January 29, 2024, and on or about June 26, 2024, in the Western District of New York, and elsewhere, the defendant, **NICHOLAS BLOOM**, with intent to harass and cause substantial emotional distress to another person, that is Victim 1, a person known to the Grand Jury, did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1.

**All in violation of Title 18, United States Code, Section 2261A(2)(B).**

**COUNT 2**

**(Cyberstalking)**

**The Grand Jury Further Charges That:**

Between on or about June 10, 2024, and on or about June 26, 2024, in the Western District of New York, and elsewhere, the defendant, **NICHOLAS BLOOM**, with intent to harass and cause substantial emotional distress to another person, that is Victim 2, a person known to the Grand Jury, did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 2.

**All in violation of Title 18, United States Code, Section 2261A(2)(B).**

DATED: Buffalo, New York, August 1, 2024.

TRINI E. ROSS  
United States Attorney

BY: S/CHARLES M. KRULY  
CHARLES M. KRULY  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
716-843-5838  
Charles.Kruly@usdoj.gov

A TRUE BILL:

S/FOREPERSON  
FOREPERSON